

Exhibit 2

Ezra Rosenberg

From: Rosenberg, Ezra
Sent: Tuesday, May 20, 2014 9:56 AM
To: John Scott; David Whitley; Reed Clay
Cc: Elizabeth S. Westfall Esq.; Richard Dellheim; Daniel Freeman; Jennifer Maranzano; Anna Baldwin; EXT Mark Posner; EXT Myrna Perez; Rudd, Amy; Cohan, Lindsey; EXT Gerry Hebert; EXT Chad Dunn; EXT Neil Baron; EXT Emma Simson; EXT Armand Derfner; EXT Ryan Haygood; EXT Natasha Korgaonkar; EXT Kelly Dunbar; EXT Jose Garza; EXT mvandalen; EXT rdoggett; EXT Rolando L. Rios; EXT Preston E. Henrichson
Subject: Section 5 record

Hi, John -- Here is a proposed stipulation that I believe reflects our discussion yesterday.

Subject to objections based on relevancy, the parties to this action hereby stipulate that the following may be received into evidence in this action: exhibits admitted into evidence and portions of any transcript of depositions or trial testimony given by any non-expert witness in *Texas v. Holder*, No. 1:12-cv-128 (D.D.C. 2012).

We propose the following schedule for all transcript designations:

August 5: Simultaneous designations

August 12: Simultaneous objections to designations and counter-designations

August 15: Simultaneous objections to counter-designations

Please let us have your thoughts. Thanks. - Ezra

Sent from my iPad

Ezra Rosenberg

From: Wolf, Lindsey <Lindsey.Wolf@texasattorneygeneral.gov>
Sent: Wednesday, May 21, 2014 5:46 PM
To: Rosenberg, Ezra; EXT Chad Dunn; EXT Armand Derfner; EXT Neil Baron; EXT Luis Vera Jr; EXT Hasan Ali; EXT mvandalen; EXT Gerry Hebert; EXT Ryan Haygood; EXT Rolando L. Rios; sian@henrichsonlaw.com; EXT Preston E. Henrichson; EXT Scott Brazil; pnoriega@trla.org; knewell@trla.org; cswarns@naacpldf.org; EXT Deuel Ross; EXT Leah Aden; EXT Natasha Korgaonkar; EXT Danielle Conley; EXT Richard Shordt; jonathan.paikin@wilmerhale.com; EXT Kelly Dunbar; EXT Gerry Sinzdak; EXT Sonya Lebsack; EXT Lynn Eisenberg; EXT rdoggett; EXT Emma Simson
Cc: EXT Scott Brazil; anna.baldwin@usdoj.gov; robert.berman@usdoj.gov; richard.dellheim@usdoj.gov; elizabeth.westfall@usdoj.gov; avner.shapiro@usdoj.gov; daniel.freeman@usdoj.gov; jennifer.maranzano@usdoj.gov; john.a.smith@usdoj.gov; meredith.bell-platts@usdoj.gov; bruce.gear@usdoj.gov; cswarns@naacpldf.org; EXT Deuel Ross; EXT Leah Aden; EXT Natasha Korgaonkar; EXT Danielle Conley; EXT Richard Shordt; jonathan.paikin@wilmerhale.com; EXT Kelly Dunbar; EXT Gerry Sinzdak; EXT Sonya Lebsack; EXT Lynn Eisenberg; Rudd, Amy; Yeary, Michelle; ttrainor@bmpllp.com; jnixon@bmpllp.com; jenniferl.clark@nyu.edu; EXT Vishal Agraharkar; EXT Wendy Weiser; EXT Myrna Perez; EXT Erandi Zamora; EXT Mark Posner; EXT Sonia Gill; EXT rdoggett; EXT Rolando L. Rios; EXT Jose Garza; EXT Preston E. Henrichson; EXT Emma Simson; sian@henrichsonlaw.com; pmcgraw@trla.org; bdonnell@dakpc.com; knewell@trla.org; pnoriega@trla.org; Scott, John; Clay, Reed; Whitley, David; Roscetti, Jennifer; Keister, Ronny; Deason, Whitney; Hayes, Kevin; Tatum, Stephen; Wilson, Anne; Ried, Lisa; D'Andrea, Arthur
Subject: RE: Common Interest Privilege Asserted by TLYVEF LULAC LUPE HCJCC and Hidalgo County Plaintiffs

Thank you. The dial-in is:

Phone #: 888-387-8235
Passcode 7930356#

Regards,
Lindsey

From: Rosenberg, Ezra [mailto:ezra.rosenberg@dechert.com]
Sent: Wednesday, May 21, 2014 4:42 PM
To: Wolf, Lindsey; EXT Chad Dunn; EXT Armand Derfner; EXT Neil Baron; EXT Luis Vera Jr; EXT Hasan Ali; EXT mvandalen; EXT Gerry Hebert; EXT Ryan Haygood; EXT Rolando L. Rios; sian@henrichsonlaw.com; EXT Preston E. Henrichson; EXT Scott Brazil; pnoriega@trla.org; knewell@trla.org; cswarns@naacpldf.org; EXT Deuel Ross; EXT Leah Aden; EXT Natasha Korgaonkar; EXT Danielle Conley; EXT Richard Shordt; jonathan.paikin@wilmerhale.com; EXT Kelly Dunbar; EXT Gerry Sinzdak; EXT Sonya Lebsack; EXT Lynn Eisenberg; EXT rdoggett; EXT Emma Simson
Cc: EXT Scott Brazil; anna.baldwin@usdoj.gov; robert.berman@usdoj.gov; richard.dellheim@usdoj.gov; elizabeth.westfall@usdoj.gov; avner.shapiro@usdoj.gov; daniel.freeman@usdoj.gov; jennifer.maranzano@usdoj.gov; john.a.smith@usdoj.gov; meredith.bell-platts@usdoj.gov; bruce.gear@usdoj.gov; cswarns@naacpldf.org; EXT Deuel Ross; EXT Leah Aden; EXT Natasha Korgaonkar; EXT Danielle Conley; EXT Richard Shordt; jonathan.paikin@wilmerhale.com; EXT Kelly Dunbar; EXT Gerry Sinzdak; EXT Sonya Lebsack; EXT Lynn Eisenberg; Rudd, Amy; Yeary, Michelle; ttrainor@bmpllp.com; jnixon@bmpllp.com; jenniferl.clark@nyu.edu; EXT Vishal Agraharkar; EXT Wendy Weiser; EXT Myrna Perez; EXT Erandi Zamora; EXT Mark Posner; EXT Sonia Gill; EXT rdoggett; EXT Rolando L. Rios; EXT Jose Garza; EXT Preston E. Henrichson; EXT Emma Simson; sian@henrichsonlaw.com; pmcgraw@trla.org; bdonnell@dakpc.com; knewell@trla.org; pnoriega@trla.org; Scott, John; Clay, Reed; Whitley, David; Roscetti, Jennifer;

Keister, Ronny; Deason, Whitney; Hayes, Kevin; Tatum, Stephen; Wilson, Anne; Ried, Lisa; D'Andrea, Arthur
Subject: RE: Common Interest Privilege Asserted by TLYVEF LULAC LUPE HCJCC and Hidalgo County Plaintiffs

Lindsey. I believe that the non-US plaintiff and plaintiff-intervenors will be in a position to discuss the common interest privilege at the 3 pm call tomorrow, and we may be in a position to have our position in writing to you in advance of that call. Is there a dial-in set for that call, as I was not on the original email. Thanks. - Ezra

From: Wolf, Lindsey [<mailto:Lindsey.Wolf@texasattorneygeneral.gov>]

Sent: Wednesday, May 21, 2014 5:39 PM

To: Rosenberg, Ezra; EXT Chad Dunn; EXT Armand Derfner; EXT Neil Baron; EXT Luis Vera Jr; EXT Hasan Ali; EXT mvandalen; EXT Gerry Hebert; EXT Ryan Haygood; EXT Rolando L. Rios; sian@henrichsonlaw.com; EXT Preston E. Henrichson; EXT Scott Brazil; pnoriega@trla.org; knewell@trla.org; cswarns@naacpldf.org; EXT Deuel Ross; EXT Leah Aden; EXT Natasha Korgaonkar; EXT Danielle Conley; EXT Richard Shordt; jonathan.paikin@wilmerhale.com; EXT Kelly Dunbar; EXT Gerry Sinzdak; EXT Sonya Lebsack; EXT Lynn Eisenberg; EXT rdoggett; EXT Emma Simson
Cc: EXT Scott Brazil; anna.baldwin@usdoj.gov; robert.berman@usdoj.gov; richard.dellheim@usdoj.gov; elizabeth.westfall@usdoj.gov; avner.shapiro@usdoj.gov; daniel.freeman@usdoj.gov; jennifer.maranzano@usdoj.gov; john.a.smith@usdoj.gov; meredith.bell-platts@usdoj.gov; bruce.gear@usdoj.gov; cswarns@naacpldf.org; EXT Deuel Ross; EXT Leah Aden; EXT Natasha Korgaonkar; EXT Danielle Conley; EXT Richard Shordt; jonathan.paikin@wilmerhale.com; EXT Kelly Dunbar; EXT Gerry Sinzdak; EXT Sonya Lebsack; EXT Lynn Eisenberg; Rudd, Amy; Yearly, Michelle; ttrainor@bmpllp.com; jnixon@bmpllp.com; jenniferl.clark@nyu.edu; EXT Vishal Agraharkar; EXT Wendy Weiser; EXT Myrna Perez; EXT Erandi Zamora; EXT Mark Posner; EXT Sonia Gill; EXT rdoggett; EXT Rolando L. Rios; EXT Jose Garza; EXT Preston E. Henrichson; EXT Emma Simson; sian@henrichsonlaw.com; pmcgraw@trla.org; bdonnell@dakpc.com; knewell@trla.org; pnoriega@trla.org; Scott, John; Clay, Reed; Whitley, David; Roscetti, Jennifer; Keister, Ronny; Deason, Whitney; Hayes, Kevin; Tatum, Stephen; Wilson, Anne; Ried, Lisa; D'Andrea, Arthur
Subject: RE: Common Interest Privilege Asserted by TLYVEF LULAC LUPE HCJCC and Hidalgo County Plaintiffs

It would be helpful if those participating on the meet-and-confer call tomorrow with representatives for the Texas League of Young Voters Education Fund and its individual co-plaintiffs, (2) the League of United Latin American Citizens (LULAC), and its individual co-plaintiffs, and (3) *La Union del Pueblo Entero, Inc.* and its individual co-plaintiffs, which is currently scheduled for 3 PM, would be prepared to discuss the common interest issues as well.

As discussed with Mr. Dunn this morning, we also look forward to receiving the written proposal regarding certain of the documents requested from individual Plaintiffs, discussed on the May 12 call, later today.

Thank you,



ATTORNEY GENERAL OF TEXAS
GREG ABBOTT

Lindsey E. Wolf | Assistant Attorney General | Financial Litigation, Tax, and Charitable Trusts Division | 300 West 15th Street, 6th Floor, Austin, Texas 78701 | Mail: P O Box 12548 | Austin, TX 78711-2548 | (512) 475-4233 | Fax: (512) 370-9126 | e-mail: Lindsey.Wolf@texasattorneygeneral.gov

From: Rosenberg, Ezra [<mailto:ezra.rosenberg@dechert.com>]

Sent: Wednesday, May 21, 2014 4:04 PM

To: Wolf, Lindsey; EXT Chad Dunn; EXT Armand Derfner; EXT Neil Baron; EXT Luis Vera Jr; EXT Hasan Ali; EXT mvandalen; EXT Gerry Hebert; EXT Ryan Haygood; EXT Rolando L. Rios; sian@henrichsonlaw.com; EXT Preston E. Henrichson; EXT Scott Brazil; pnoriega@trla.org; knewell@trla.org; cswarns@naacpldf.org; EXT Deuel Ross; EXT Leah Aden; EXT Natasha Korgaonkar; EXT Danielle Conley; EXT Richard Shordt; jonathan.paikin@wilmerhale.com; EXT Kelly Dunbar; EXT Gerry Sinzdak; EXT Sonya Lebsack; EXT Lynn Eisenberg; EXT rdoggett; EXT Emma Simson

Cc: EXT Scott Brazil; anna.baldwin@usdoj.gov; robert.berman@usdoj.gov; richard.dellheim@usdoj.gov; elizabeth.westfall@usdoj.gov; avner.shapiro@usdoj.gov; daniel.freeman@usdoj.gov; jennifer.maranzano@usdoj.gov; john.a.smith@usdoj.gov; meredith.bell-platts@usdoj.gov; bruce.gear@usdoj.gov; cswarns@naacpldf.org; EXT Deuel Ross; EXT Leah Aden; EXT Natasha Korgaonkar; EXT Danielle Conley; EXT Richard Shordt; jonathan.paikin@wilmerhale.com; EXT Kelly Dunbar; EXT Gerry Sinzdak; EXT Sonya Lebsack; EXT Lynn Eisenberg; Rudd, Amy; Yeary, Michelle; ttrainor@bmpllp.com; jnixon@bmpllp.com; jenniferl.clark@nyu.edu; EXT Vishal Agraharkar; EXT Wendy Weiser; EXT Myrna Perez; EXT Erandi Zamora; EXT Mark Posner; EXT Sonia Gill; EXT rdoggett; EXT Rolando L. Rios; EXT Jose Garza; EXT Preston E. Henrichson; EXT Emma Simson; sian@henrichsonlaw.com; pmcgraw@trla.org; bdonnell@dakpc.com; knewell@trla.org; pnoriega@trla.org; Scott, John; Clay, Reed; Whitley, David; Roscetti, Jennifer; Keister, Ronny; Deason, Whitney; Hayes, Kevin; Tatum, Stephen; Wilson, Anne; Ried, Lisa; D'Andrea, Arthur

Subject: RE: Common Interest Privilege Asserted by TLYVEF LULAC LUPE HCJCC and Hidalgo County Plaintiffs

Lindsey. In that it took Texas more than a week to provide us with the email that was promised on our May 12 call, your providing us with 24 hours to respond is not reasonable, and we are unable to meet your deadline. The non-US plaintiff and plaintiff-intervenor groups are discussing their response and we will respond to you by close of business tomorrow, May 22. Thanks. -- Ezra

From: Wolf, Lindsey [<mailto:Lindsey.Wolf@texasattorneygeneral.gov>]

Sent: Tuesday, May 20, 2014 6:30 PM

To: EXT Chad Dunn; EXT Armand Derfner; EXT Neil Baron; EXT Luis Vera Jr; EXT Hasan Ali; EXT mvandalen; EXT Gerry Hebert; EXT Ryan Haygood; EXT Rolando L. Rios; sian@henrichsonlaw.com; EXT Preston E. Henrichson; EXT Scott Brazil; pnoriega@trla.org; knewell@trla.org; cswarns@naacpldf.org; EXT Deuel Ross; EXT Leah Aden; EXT Natasha Korgaonkar; EXT Danielle Conley; EXT Richard Shordt; jonathan.paikin@wilmerhale.com; EXT Kelly Dunbar; EXT Gerry Sinzdak; EXT Sonya Lebsack; EXT Lynn Eisenberg; EXT rdoggett; EXT Emma Simson

Cc: EXT Scott Brazil; anna.baldwin@usdoj.gov; robert.berman@usdoj.gov; richard.dellheim@usdoj.gov; elizabeth.westfall@usdoj.gov; avner.shapiro@usdoj.gov; daniel.freeman@usdoj.gov; jennifer.maranzano@usdoj.gov; john.a.smith@usdoj.gov; meredith.bell-platts@usdoj.gov; bruce.gear@usdoj.gov; cswarns@naacpldf.org; EXT Deuel Ross; EXT Leah Aden; EXT Natasha Korgaonkar; EXT Danielle Conley; EXT Richard Shordt; jonathan.paikin@wilmerhale.com; EXT Kelly Dunbar; EXT Gerry Sinzdak; EXT Sonya Lebsack; EXT Lynn Eisenberg; Rudd, Amy; Rosenberg, Ezra; Yeary, Michelle; ttrainor@bmpllp.com; jnixon@bmpllp.com; jenniferl.clark@nyu.edu; EXT Vishal Agraharkar; EXT Wendy Weiser; EXT Myrna Perez; EXT Erandi Zamora; EXT Mark Posner; EXT Sonia Gill; EXT rdoggett; EXT Rolando L. Rios; EXT Jose Garza; EXT Preston E. Henrichson; EXT Emma Simson; sian@henrichsonlaw.com; pmcgraw@trla.org; bdonnell@dakpc.com; knewell@trla.org; pnoriega@trla.org; Scott, John; Clay, Reed; Whitley, David; Roscetti, Jennifer; Keister, Ronny; Deason, Whitney; Hayes, Kevin; Tatum, Stephen; Wilson, Anne; Ried, Lisa; D'Andrea, Arthur

Subject: Common Interest Privilege Asserted by TLYVEF LULAC LUPE HCJCC and Hidalgo County Plaintiffs

Counsel,

At the Meet-and-Confer with representatives for (1) the Texas League of Young Voters Education Fund and its individual co-plaintiffs, (2) the League of United Latin American Citizens (LULAC), and its individual co-plaintiffs, and (3) *La Union del Pueblo Entero, Inc.* and its individual co-plaintiffs, on May 12, 2014, Kevin Hayes and I informed you that we needed to circle back internally, and then we would provide a written proposal regarding Defendants' position on the Common Interest Privilege. We also referred to such a proposal in our May 12, 2014 Meet-and-Confer with representatives for (1) the Hispanic County Judges and County Commissioners, and its individual co-plaintiff, and (2) Hidalgo County. This proposal follows.

Defendants understand that Plaintiffs object to requests which seek the production of documents and tangible things relating to communications between them, or between their counsel, regarding SB 14. SB 14 is defined in the RFPs to include predecessor bills dating back to 2005, and when Defendants refer to SB 14 below, they are using that definition. Defendants propose the following:

- **Intra-Plaintiff Communications – Section 2 Case:** Communications between plaintiffs to this 2013 lawsuit (the “Section 2 Case”) concerning SB 14, dated before or after the date on which each of the participants in each respective communication was added as a party to the Section 2 Case, and which do not involve counsel, are not

privileged. Accordingly, these communications should be produced. If any of these communications are alleged to be privileged by any plaintiff to the Section 2 Case on any ground, they must be logged. **Please advise whether you agree that these communications are not privileged. Also, if you claim some or all such communications are privileged, please advise whether you agree that documents withheld on privilege grounds would need to be identified in a privilege log.**

- **Intra-Plaintiff Counsel Communications – Section 2 Case:** Communications between counsel for the parties to the Section 2 Case concerning SB 14, are not privileged or otherwise protected by a common interest privilege, even if they relate to trial strategy or discovery, and, accordingly, should be produced. **Please advise whether you agree that these communications are not privileged. Also, if you claim some or all such communications are privileged, please advise whether you agree that documents withheld on privilege grounds would need to be identified in a privilege log.**
- **Communications Involving a Participant Not Yet a Plaintiff in the Section 2 Case At the Time of the Communication:** Communications between or among parties, including or not including counsel for the parties to the Section 2 Case, which occurred prior to any or all of the participants to the communication being added as either (a) a plaintiff or (b) counsel to a plaintiff in the Section 2 Case, subject to the Section 5 Communications Carve-Out defined *infra*, are not privileged and should be produced. If any of those communications are alleged to be privileged by any Plaintiff on any ground, they must be logged. **Please advise whether you agree that these communications are not privileged. Also, if you claim some or all such communications are privileged, please advise whether you agree that documents withheld on privilege grounds would need to be identified in a privilege log.**
 - **The Section 5 Communications Carve Out:** Defendants recognize that communications that took place during the 2012 Administrative Preclearance Litigation (the “Section 5 Case”), where each participant to the communication was either a party or counsel to a party in the Section 5 Case, and the Section 5 Case was pending as of the date the communication occurred, may be privileged (the “Section 5 Communications”). Defendants therefore propose limiting requests for production so as not to require Plaintiffs to log such Section 5 Communications to the extent Plaintiffs allege they are privileged.

Please advise by the close of business on May 21, 2014 whether you agree that the 3 groups of communications identified above are not privileged. Also, if you allege privilege does apply, please advise by that time whether you agree that documents withheld on the grounds of privilege must be logged.

Defendants are in the process of reaching out to counsel for each of the 5 Plaintiff groups identified above individually, to discuss the remaining outstanding issues discussed at the Meet-And-Confers.

Regards,



ATTORNEY GENERAL OF TEXAS
GREG ABBOTT

Lindsey E. Wolf | Assistant Attorney General | Financial Litigation, Tax, and Charitable Trusts Division | 300 West 15th Street, 6th Floor, Austin, Texas 78701 | Mail: P O Box 12548 | Austin, TX 78711-2548 | (512) 475-4233 | Fax: (512) 370-9126 | e-mail: Lindsey.Wolf@texasattorneygeneral.gov

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Ezra Rosenberg

From: D'Andrea, Arthur <Arthur.D'Andrea@texasattorneygeneral.gov>
Sent: Thursday, May 22, 2014 7:33 PM
To: Rosenberg, Ezra
Cc: elizabeth.westfall@usdoj.gov; daniel.freeman@usdoj.gov; EXT Kelly Dunbar; EXT Neil Baron
Subject: RE: Legislators' Depositions

Thanks Ezra. I certainly understand why you can't negotiate the deposition dates until our motion to quash is filed. I would do the same thing if I were you. Still I wanted to give you advance notice that we will be filing a motion to quash and therefore will not be producing witnesses on those days. I will call you after we file to get these dates sorted out. We will file as soon as possible, either tomorrow or first thing next week. My attention is unfortunately divided between this case and an oral argument next week (where Texas will be standing shoulder to shoulder with our friends at DOJ).

From: Rosenberg, Ezra [ezra.rosenberg@dechert.com]
Sent: Thursday, May 22, 2014 2:56 PM
To: D'Andrea, Arthur
Cc: elizabeth.westfall@usdoj.gov; daniel.freeman@usdoj.gov; EXT Kelly Dunbar; EXT Neil Baron
Subject: RE: Legislators' Depositions

Hi, Arthur. I understand that there are depositions currently set for May 28, May 29 and May 30. Until such time as your motions to quash are filed, we're not in a position to lift those dates. Once your motions are filed, we'll discuss alternative dates for sometime in June, but, under no circumstances can we agree that all of the depositions will be pushed to the last week of discovery. Let me know if you have any questions. Thanks. -- Ezra

From: D'Andrea, Arthur [mailto:Arthur.D'Andrea@texasattorneygeneral.gov]
Sent: Wednesday, May 21, 2014 8:52 PM
To: Rosenberg, Ezra
Cc: elizabeth.westfall@usdoj.gov; daniel.freeman@usdoj.gov; EXT Kelly Dunbar; EXT Neil Baron
Subject: RE: Legislators' Depositions

To my friends in opposition:

We have decided to file motions to quash the subpoenas for deposition. I will file these motions soon, so we can get this issue resolved. These motions will assert (big surprise) legislative privilege. See, e.g., *Corporacion Insular de Seguros v. Garcia*, 709 F. Supp. 288, 297 (D.P.R. 1989) ("It does not follow . . . that because Dr. Aponte's [a legislative aide] documents are discoverable that he himself is automatically subject to a deposition."). Still, I agree it's prudent to schedule the depositions anyway, in the event we lose the motions. I agree to offer the legislators for deposition in our office in Austin. But given the schedule of the legislators and OAG attorneys, and the need for travel, we'd prefer to schedule all the depositions starting the week of June 23rd. I appreciate your flexibility and patience, and I will return the same.

-Arthur

From: Rosenberg, Ezra [ezra.rosenberg@dechert.com]
Sent: Wednesday, May 21, 2014 4:45 PM
To: D'Andrea, Arthur
Cc: elizabeth.westfall@usdoj.gov<mailto:elizabeth.westfall@usdoj.gov>;
daniel.freeman@usdoj.gov<mailto:daniel.freeman@usdoj.gov>; EXT Kelly Dunbar; EXT Neil Baron
Subject: RE: Legislators' Depositions
Thanks, Arthur.

From: D'Andrea, Arthur [mailto:Arthur.D'Andrea@texasattorneygeneral.gov]
Sent: Wednesday, May 21, 2014 5:45 PM
To: Rosenberg, Ezra
Cc: elizabeth.westfall@usdoj.gov<mailto:elizabeth.westfall@usdoj.gov>;
daniel.freeman@usdoj.gov<mailto:daniel.freeman@usdoj.gov>; EXT Kelly Dunbar; EXT Neil Baron
Subject: RE: Legislators' Depositions

Dear Ezra & Elizabeth:

I am sorry for missing your calls. I had an oral argument today, and I'm still getting the legislators sorted out. I'll have an answer in the next few hours.

From: Rosenberg, Ezra [ezra.rosenberg@dechert.com]
Sent: Wednesday, May 21, 2014 4:38 PM
To: D'Andrea, Arthur
Cc: elizabeth.westfall@usdoj.gov<mailto:elizabeth.westfall@usdoj.gov>;
daniel.freeman@usdoj.gov<mailto:daniel.freeman@usdoj.gov>; EXT Kelly Dunbar; EXT Neil Baron
Subject: Legislators' Depositions
Hi, Arthur. When we spoke yesterday, you said you'd get back to me last night or today about the legislators' depositions. We've not heard from you. I understand that DOJ has placed calls to you today to discuss this issue also. Please advise as to the status. Thanks. - Ezra

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Ezra Rosenberg

From: Rosenberg, Ezra
Sent: Thursday, May 29, 2014 6:43 AM
To: Arthur D'Andrea
Cc: Daniel Freeman; EXT Chad Dunn; EXT Neil Baron; EXT Scott Brazil; EXT Kelly Dunbar
Subject: Call to discuss dates for legislator depositions

Hi, Arthur, as per the Court's directive, could you provide us with a time today to discuss dates for legislator depositions. It might speed things up -- and perhaps even obviate the need for a call -- if you provided us with a revised schedule. As per previous emails, any proposal that would anticipate all the legislator depositions taking place the last week of June will not be acceptable. Thanks. - Ezra

Sent from my iPad